SEP 2 1 1999 1028

September 20, 1999

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Comments on Draft Programmatic EIS/EIR of June 1999

Dear Mr. Breitenbach,

- There should be a greater water source protection and conservation element in this Bay-Delta Plan. In particular the groundwater basins of California are the natural resource reserves of a region and should be returned to an integrity for both drinking water and agricultural use before any further allocations of imported water are made to that region.

- Non-structural solutions of conservation, reclamation, pollution prevention and drinking water treatment should be the focus of this first seven-year phase. Methods to reduce loss to evaporation in canals and reservoirs by undergrounding should be consideration in infrastructure upgrade projects.

- De-salination plants could be encouraged in coastal cities for drought use.

- Ag water allocations should be kept for agriculture. If land use changes are made out of agriculture then credits should be returned to state agriculture, in particular to allocations for the small family farms.

- Diversions from rivers should also be evaluated for agriculture water quality use criteria. Dilution prevents pollution, and a sufficient volume of flow is necessary to buffer downstream farmers from pesticide and salt runoff from upstream farmers and urban communities, ie Sacramento-Hood diversion.

- Water flows in navigable rivers like the Sacramento must be maintained to a level to guarantee waterway safety, navigability and riparian integrity.

- Inflow Standards for San Francisco, San Pablo, South and Suisun Bays should be mandatory in this Bay-Delta Plan to assure the health and sustainability of the fisheries and ecosystems of the Estuary. Flows from dams need to be modulated to seasonal needs of migratory fish, and the climactic variability of drought and El Nino years. Diversions especially must be monitored in this.

- Flows must be sufficient in storm events to carry high sediment loads out of the Delta and San Francisco Bay to beyond the Golden Gate. In-Bay sediments will resuspend by wave action and deposit in navigation channels, ports and migrate down eastern shore to South Bay. COE Bay Model must test baseline, as I believe already too much flow diversion has undermined Bay water quality.

- The seven-year fishery restoration plan for the San Francisco Estuary must be assured of sustainability success by release and flow standards proven to accomodate indigenous fish populations in variable California climate conditions. 43 million acre feet of reservoir storage could be managed to accomplish this.

- Engineered diversions such as the new North Delta Improvements should not be seriously considered until a functioning Estuary inflow standard is in effect and has been thoroughly tested over a number of years. Bay modeling is basic to the feasibility of this diversion. The fish screens cannot block incoming salmonids who are returning to water source of origin, the upper Sacramento, so please include that in scope of project..

Sincerely,

Libby Lucas

Libby Lucas,
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